

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SAMANTHA SIVA KUMARAN and THE A STAR
GROUP, INC d/b/a TIMETRICS,

Plaintiffs,

-against-

NORTHLAND ENERGY TRADING, LLC,
HEDGE SOLUTIONS, INC., RICHARD M. LARKIN
DANIEL LOTHROP and DOMENIC BRAMANTE,

Defendants.
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Case No. 1:19-cv-08345-MKV-DCF

**NOTICE OF
MOTION TO DISMISS**

PLEASE TAKE NOTICE that, upon the accompanying declaration of Ellen Tobin, Esq. dated July 9, 2020 and the exhibit thereto, and the accompanying Memorandum of Law and upon all pleadings and proceedings had herein, defendants Northland Energy Trading, LLC, Hedge Solutions, Inc., Richard M. Larkin, Daniel Lothrop and Domenic Bramante (collectively, “Defendants”) will move this Court, before the Honorable Mary Kay Vyskocil, at the Courthouse located at 500 Pearl Street, New York, New York 10007, on September 29, 2020, for an Order pursuant to Federal Rule of Civil Procedure 12(b)(6), dismissing plaintiffs’ amended complaint in its entirety, with prejudice, and granting all other relief deemed just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court’s Order dated June 18, 2020, plaintiffs shall respond to this motion by September 7, 2020, and Defendants shall reply by September 28, 2020.

Dated: Uniondale, New York
July 9, 2020

WESTERMAN BALL EDERER MILLER
ZUCKER & SHARFSTEIN, LLP

By: /s/ Ellen Tobin, Esq.
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